

August 4, 2000

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Donald Hesler, P.E.
Division of Environmental Remediation
New York State Department of
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50 Wolf Road
Albany, NY 12233-7010

Response of Honeywell International Inc. (formerly AlliedSignal Inc.)
to Supplemental Request for Information Concerning Honeywell's Facilities

Dear Mr. Hesler:

On behalf of Honeywell International Inc. ("Honeywell") (formerly AlliedSignal Inc.), we submit the enclosed response to the "Supplemental Request for Information Concerning Honeywell's Facilities in Onondaga County, New York" dated June 30, 2000 (the "Supplemental Request"). The enclosed response supplements the Onondaga Lake RI/FS Site History Report dated July 1992; AlliedSignal's response dated August 19, 1996, to the Joint Request for Information; AlliedSignal's response dated May 14, 1997, to the Joint Supplemental Request for Information; AlliedSignal's response dated April 22, 1999, to the Joint Request for Information Concerning Use and Disposal of PCBs; and Honeywell's response dated March 28, 2000, to the Supplemental Request for Information Concerning AlliedSignal's Facilities.

Honeywell's response addresses each of the questions set forth in the Supplemental Request. Honeywell submits the enclosed response to comply with its obligations under the Consent Decree between the State of New York and AlliedSignal, entered by the District Court for the Northern District of New York on March 17, 1992, and thereafter amended and supplemented, in particular paragraph 27 of the Decree. In accordance with paragraph 68 of the Decree, Honeywell is not obligated to respond to discovery requests, motions and requests for information in "other legal proceedings with respect to the nature and extent of contamination in the Onondaga Lake System," except as directed by the court. Consequently, Honeywell respectfully disagrees with the view expressed in the

Donald Hesler, P.E.

August 4, 2000

Page 2

Supplemental Request that it is obligated pursuant to other legal authorities identified in the State's December 22, 1999 information request to respond to the Request.

Lastly, Honeywell continues to maintain that a certification of its responses to this and all previous Requests for Information is not required or authorized under CERCLA § 104(e) and would be superfluous. Indeed, as EPA and NYSDEQ previously have noted, 18 U.S.C. § 1001 and New York Penal Law §§ 175.30 and 175.35 already contain substantial penalties for providing false, fictitious or fraudulent statements or representations. Therefore, Honeywell has not provided a certification of its responses.

If you have any questions or comments about this letter or the enclosed response, please let Dan Jordanger or me know.

Sincerely,



Manning Gasch Jr.

Enclosures

cc: Mr. Robert Nunes (w/enclosures)
Mr. James Vener (w/enclosures)
George A. Shanahan, Esquire (w/o enclosures) ✓
Carol Conyers, Esquire (w/o enclosures)
Philip Bein, Esquire (w/o enclosures)
Mr. John Davis (w/o enclosures)
Gordon D. Quin, Esquire (w/enclosures)
Dan J. Jordanger, Esquire (w/enclosures)